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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**
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12 RODNEY HERMANSON, an individual, 13 Plaintiff, 14 v. 15 CENTURY NATIONAL INSURANCE 16 COMPANY, a foreign insurance company, DOES 1-100, individuals; and 17 ROES 1-100, companies, 18 Defendants.	CASE NO. 2:19-cv-00656-RFB-GWF STIPULATION AND [proposed] ORDER TO EXTEND BRIEFING DEADLINES FOR DEFENDANT'S MOTION FOR SUMMARY JUDGMENT (ECF No. 34) (First Request)
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20 **IT IS HEREBY STIPULATED AND AGREED** between Plaintiff
21 RODNEY HERMANSON and Defendant CENTURY NATIONAL INSURANCE
22 COMPANY, by and through their undersigned counsel of record, that good cause
23 exists for the deadline for Plaintiff to file his Response to Defendant's Motion for
24 Summary Judgment (ECF No. 34) be extended from January 27, 2020, until
25 **January 30, 2020**. Defendant filed its motion on January 6, 2020.

26 Good cause exists for this extension as Plaintiff recently received, on
27 January 22, 2020, Defendant's first supplemental initial disclosures, which
28 produced over 900 pages of new documents. In light of the same and pending the

1 Court's approval, Defendant's counsel has graciously agreed to a three-day
2 extension, through and until January 30, 2020.

3 This is the first extension requested in connection with the underlying
4 motion, and is presented in good faith and not for purposes of delay. The Parties
5 therefore respectfully request that this Court approve the foregoing stipulation.

6 DATED this 27th day of January 2020. DATED this 27th day of January 2020.

7 **HALL JAFFE & CLAYTON, LLP**

BAUMAN LOEWE WITT & MAXWELL

8 /s/ Michael R. Hall

/s/ Michael C. Mills

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Attorney for Defendant

Century National Insurance Company

14 **ORDER**

15 **IT IS SO ORDERED.**

16 DATED this 30th day of January 2020.

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19 RICHARD F. BOULWARE, II
20 UNITED STATES DISTRICT JUDGE
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